



## ENERGY AND ENVIRONMENT CABINET

Steven L. Beshear  
Governor

Department for Environmental Protection  
Division of Waste Management  
200 Fair Oaks, 2<sup>nd</sup> Floor  
Frankfort, Kentucky 40601-1190  
[www.kentucky.gov](http://www.kentucky.gov)

Leonard K. Peters  
Secretary

June 8, 2015

Ms. Jennifer Woodard, Site Lead  
US Department of Energy  
Portsmouth/Paducah Project Site Office  
5501 Hobbs Road  
Kevil, Kentucky 42002

**RE: Comments to the Methods for Conducting Risk Assessments and Risk Evaluations at the Paducah Gaseous Diffusion Plant – Ecological (DOE/LX/07-0107&D2/R1/V2)**  
Paducah Site  
Paducah, McCracken County, Kentucky  
KY8-890-008-982

Ms. Woodard:

The Kentucky Division of Waste Management (Division) has completed its review of the *D2/R1V2 Methods for Conducting Risk Assessments and Risk Evaluations at the Paducah Gaseous Diffusion Plant - Ecological*, dated May 28, 2015. Please find the Division's comments to the subject document as an attachment.

If you have any questions or require additional information, please contact April Webb at (502) 564-6716, or e-mail at [april.webb@ky.gov](mailto:april.webb@ky.gov).

Sincerely,

*Bill Schneider*

For April J. Webb, P.E., Manager  
Hazardous Waste Branch

AJW:lwj:jmg

EC: Julie Corkran, US EPA – Region 4; [corkran.julie@epa.gov](mailto:corkran.julie@epa.gov)  
Jon Richards, US EPA – Region 4; [Richards.jon@epa.gov](mailto:Richards.jon@epa.gov)  
William E. Murphie, DOE – Paducah; [William.murphie@lex.doe.gov](mailto:William.murphie@lex.doe.gov)  
Jennifer Woodard, DOE – Paducah, [Jennifer.Woodard@lex.doe.gov](mailto:Jennifer.Woodard@lex.doe.gov)  
Rich Bonczek, DOE – Lexington, [Rich.Bonczek@lex.doe.gov](mailto:Rich.Bonczek@lex.doe.gov)  
Kim Knerr, DOE – Paducah, [kim.Knerr@lex.doe.gov](mailto:kim.Knerr@lex.doe.gov)  
Mark Duff, LATAKY – Kevil; [mark.duff@lataky.com](mailto:mark.duff@lataky.com)  
Myrna Redfield, LATAKY – Kevil, [Myrna.Redfield@lataky.com](mailto:Myrna.Redfield@lataky.com)  
John Wesley Morgan, LATAKY – Kevil, [John.Morgan@lataky.com](mailto:John.Morgan@lataky.com)  
Jana White, LATAKY – Kevil; [jana.white@lataky.com](mailto:jana.white@lataky.com)  
Joseph Towarnicky, LATAKY – Kevil; [Joseph.towarnicky@lataky.com](mailto:Joseph.towarnicky@lataky.com)  
Craig Jones, LATAKY – Kevil, [craig.jones@lataky.com](mailto:craig.jones@lataky.com)  
Karen Walker, LATAKY – Kevil; [Karen.walker@lataky.com](mailto:Karen.walker@lataky.com)  
Sunny Osborne, LATAKY – Kevil; [sunny.osborne@lataky.com](mailto:sunny.osborne@lataky.com)  
Leanne Garner, LATAKY – Kevil; [Leanne.garner@lataky.com](mailto:Leanne.garner@lataky.com)  
LATAKY – General; [latacorrespondence@lataky.com](mailto:latacorrespondence@lataky.com)  
Karla Morehead, P2S – Paducah; [karla.morehead@lex.doe.gov](mailto:karla.morehead@lex.doe.gov)  
Christa Dailey, P2S – Paducah, [christa.dailey@lex.doe.gov](mailto:christa.dailey@lex.doe.gov)  
Bethany Jones, P2S – Paducah; [Bethany.jones@lex.doe.gov](mailto:Bethany.jones@lex.doe.gov)  
Paige Sullivan, P2S – Paducah; [paige.sullivan@lex.doe.gov](mailto:paige.sullivan@lex.doe.gov)  
Jim Ethridge, CAB – Paducah; [jim@pgdpcab.org](mailto:jim@pgdpcab.org)  
Matt McKinley, CHFS – Frankfort, [matthewW.mckinley@ky.gov](mailto:matthewW.mckinley@ky.gov)  
Stephanie Brock, CHFS – Frankfort, [StephanieC.Brock@ky.gov](mailto:StephanieC.Brock@ky.gov)  
Nathan Garner, CHFS – Frankfort; [Nathan.garner@ky.gov](mailto:Nathan.garner@ky.gov)  
Gaye Brewer, KDWM – Paducah, [gaye.brewer@ky.gov](mailto:gaye.brewer@ky.gov)  
Mike Guffey, KDWM – Frankfort; [mike.guffey@ky.gov](mailto:mike.guffey@ky.gov)  
Leo Williamson, KDWM – Frankfort, [Leo.Williamson@ky.gov](mailto:Leo.Williamson@ky.gov)  
  
DWM File #820-A; Graybar: ARM20090017 (Risk Methods - Ecological)  
Attachment: Kentucky Comments

**Kentucky Risk Assessment Branch Comments to the  
Methods for Conducting Risk Assessments and Risk Evaluations at the Paducah Gaseous  
Diffusion Plant – Ecological**

**Paducah Gaseous Diffusion Plant, Paducah, Kentucky**

**DOE/LX/07-0107&D2/R1/V2**

**June 4, 2015**

**Specific Comments:**

**1. Section 2.3.1 Reevaluation of COPECs (Step 3a) Preliminary HQs. (Page 2-8):**

The second sentence needs revision. It reads, “This set of preliminary HQs is based on individual receptors differs from the screening HQs based on general endpoints that were generated during Steps 1 and 2.” Please remove “is” and replace with “and”.

**2. Section 2.3.1 Reevaluation of COPECs (Step 3a) Site-Specific Tissue Concentrations-bioaccumulation. (Page 2-11):**

The last sentence states, “Available benchmarks for tissue residues in birds and mammals are presented in Table A.11.” It should be “Tables A.10 and A.11 respectively.”

**3. APPENDIX B: EXPOSURE PARAMETERS FOR PGDP MODEL ECOLOGICAL RECEPTORS - Table B.1. Exposure Parameters for PGDP Model Ecological Receptors (Pages B-3 to B-6):**

The following are cited in Table B.1, but are not listed in the sources at the end of Table B.1. Please add the following references:

Ernst, C.H. 1968. Kidney efficiencies of three Pennsylvania mice. Trans. Kentucky Acad. Sci. 29: 21-24.

Sample, B.E., M.S. Alpin, R.A. Efroymsen, G.W. Suter, and C.J.E. Welsh. 1997. Methods and Tools for Estimation of the Exposure of Terrestrial Wildlife to Contaminants. ORNL/TM-13391, Office of Environmental Policy and Assistance. Oak Ridge National Laboratory, Oak Ridge, TN. October.

**(End of Kentucky Comments)**